

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CARMEN JOHN PERRI, an individual,
Plaintiff,

v.

WEDGEWOOD COURT III ASSOCIATES
LLC, a Washington limited liability
company,
Defendant.

Case No. 2:19-cv-00110-JLR

**STIPULATION AND
~~PROPOSED~~ ORDER TO
EXTEND DEADLINE FOR
DEFENDANT TO RESPOND
TO COMPLAINT AND
INITIAL SCHEDULING
DATES**

**NOTE ON MOTION
CALENDAR:**

March 14, 2019

Plaintiff Carmen John Perri ("Plaintiff") and defendant Wedgewood Court III Associates, LLC ("Defendant"), by and through their undersigned counsel, hereby stipulate to a second 30-day extension of the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1] to further facilitate settlement discussions. The parties also request that the Court reset the deadline for the parties to exchange Initial Disclosures pursuant to FRCP 26(a)(1) to May 10, 2019 and reset the deadline for the parties to submit a combined Joint Status Report and Discovery Plan to May 17, 2019.

The Parties hereby submit that good cause exists for extensions of the time, as follows.

1. Plaintiff filed the Complaint on January 24, 2019.

STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINES - 1
CASE NO. 2:19-CV-00110-JLR

**GOLDFARB & HUCK
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1 2. Defendant received the Summons and Complaint on February 7, 2019.

2 3. Plaintiff made a settlement demand, and, to allow Defendant the opportunity to
3 consider the settlement demand, the parties agreed to a 30-day extension of the deadline for
4 Defendant to respond to the Complaint, to a new deadline of April 1, 2019.

5 4. The Court granted the parties' stipulated motion and extended the deadline for
6 Defendant to respond to the Complaint to April 1, 2019. *See* Dkt. No. 8.

7 5. Per the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early
8 Settlement [Dkt. No. 9], the deadline for the parties to exchange Initial Disclosures is March 28,
9 2019 and the deadline for the parties to submit a combined Joint Status Report and Discovery
10 Plan is April 4, 2019.

11 6. The parties have made progress in their discussions regarding potential resolution
12 of this matter, and the parties agree that the requested extensions would facilitate such
13 discussions, by allowing more time before Defendant undertakes the expense of preparing a
14 response to the Complaint and before both parties undertake the expense of preparing Initial
15 Disclosures and a combined Joint Status Report and Discovery Plan.

1 RESPECTFULLY SUBMITTED this March 14, 2019

2 /s/ Kit W. Roth

3 Kit W. Roth, WSBA No. 33059

4 /s/ R. Omar Riojas

5 R. Omar Riojas, WSBA No. 35400

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13 Attorneys for Defendant

14 /s/ Dan. N. Fiorito

15 Dan N. Fiorito, WSBA No. 34009

16 **THE LAW OFFICE OF DAN N. FIORITO III**

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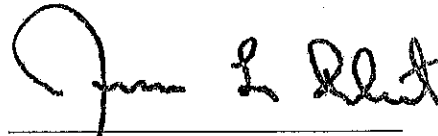
21 Email: dan@danfiorito.com

22 Attorney for Plaintiff

23 **ORDER**

24 Pursuant to the parties' stipulation, IT IS SO ORDERED.

25 Dated this 18th day of March, 2019

26 

James L. Robart

United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2019 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

DATED this March 14, 2019.

/s/ Kit W. Roth
Kit W. Roth, WSBA No. 33059